

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AIOI INSURANCE COMPANY, as subrogee and
assignee of YAZAKI NORTH AMERICA, INC.

CIVIL ACTION NO.: 1:08-cv-01479-TPG

Plaintiff(s),

v.

TIMELY INTEGRATED, INC.

Defendant(s).

**NOTICE OF MOTION FOR LEAVE TO
FILE THIRD-PARTY INTERVENOR
COMPLAINT ON BEHALF OF LUCKY
7 TRANSPORTATION**

PLEASE TAKE NOTICE that pursuant to Rule 26 of the Federal Rules of Civil Procedure, for the reasons set forth in the Affirmation of Eric B. Schoenfeld, Esq. and Memorandum of Law submitted in support of this motion, proposed Intervenor third-party Plaintiff, LUCKY 7 TRANSPORTATION will move this Court at the United States Courthouse located at, 500 Pearl Street, New York, New York 10007-1312, before the Honorable Thomas P. Griesa, U.S.D.J., on a date to be chosen by the Court, for an Order for granting leave to proposed Intervenor Third-Party Plaintiff LUCKY 7 TRANSPORTATION to file a third-party intervenor complaint against Plaintiff AIOI INSURANCE COMPANY, as subrogee and assignee of YAZAKI NORTH AMERICA, INC.

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda shall be served within ten business days after receipt of the moving papers and any reply affidavits and memoranda of law shall be served within five business days after service of the answering papers.

Respectfully submitted

SCHOENFELD MORELAND, P.C.
Attorneys for proposed Intervenor Third-Party Plaintiff
LUCKY 7 TRANSPORTATION

By: /s/

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Our File: PGI-3743-DN1

Dated: June 12, 2008
New York, New York

TO: James F. Campise, Esq.
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Attorney for Plaintiff AIOI Insurance Company as Assignee of Yazaki North America, Inc.

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